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7 Counsel for Defendant  
8 HECTOR DAVILA-CHAVEZ  
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10 UNITED STATES DISTRICT COURT  
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12 NORTHERN DISTRICT OF CALIFORNIA  
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14 SAN JOSE DIVISION  
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16 UNITED STATES OF AMERICA,

17 Plaintiff,  
18 v.  
19 HECTOR DAVILA-CHAVEZ,  
Defendant.

Case No. 19 Cr. 181 EJD

STIPULATION TO CONTINUE STATUS  
CONFERENCE; ~~[PROPOSED]~~ ORDER

Before the Honorable Edward J. Davila  
United States District Judge

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## **STIPULATION**

Defendant Hector Jesus Davila-Chavez, represented by AFPD Dejan M. Gantar, and the Government, represented by AUSA Jeff Nedrow and SAUSA Ann Koppuzha, respectfully request that the status conference currently scheduled for April 5, 2021 be continued to June 14, 2021.

The reason for the requested continuance is that defense counsel continues to conduct research and investigation regarding pretrial motions, which the parties anticipate will aid in discussions regarding potential disposition, and requires additional time toward that end. The parties anticipate that by the next status conference, they will inform the Court as to whether they have reached a resolution, or whether they will request the Court set a briefing schedule for pretrial motions.

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The parties further stipulate and agree that the time between April 5, 2021 and June 14, 2021 should be excluded from the period of time within which the defendant's trial must commence pursuant to the Speedy Trial Act in order to allow counsel sufficient time to effectively prepare, taking into account the exercise of due diligence. Furthermore, the parties stipulate that the ends of justice served by granting the request outweigh the best interests of the public and the defendant in a speedy trial.

## IT IS SO STIPULATED.

GEOFFREY HANSEN  
Acting Federal Public Defender

DATED: March 29, 2021

/s/ *Dejan M. Gantar*  
DEJAN M. GANTAR  
Assistant Federal Public Defender

/s/ *Jeff Nedrow*  
**JEFF NEDROW**  
Assistant United States Attorney

/s/ *Ann Koppuzha*  
ANN KOPPUZHA  
Special Assistant United States Attorney

\*The filing attorney certifies that he has received written authorization to file this Stipulation and [Proposed] Order on behalf of the non-filing attorney.

1                   ~~PROPOSED~~ ORDER

2                   Pursuant to the parties' stipulation, and for good cause shown, the Court HEREBY  
3 ORDERS that the status conference for April 5, 2021 at 1:30 p.m. be continued to June 14,  
4 2021 at 1:30 p.m. For good cause shown, the Court further finds that failing to exclude the  
5 time between April 5, 2021 and June 14, 2021 would deny counsel the reasonable time  
6 necessary for effective preparation, taking into account the exercise of due diligence, and that  
7 the ends of justice served by excluding the time between April 5, 2021 and June 14, 2021 from  
8 computation under the Speedy Trial Act outweigh the best interests of the public and the  
9 defendant in a speedy trial.

10                  Therefore, IT IS HEREBY FURTHER ORDERED that the time between April 5, 2021  
11 and June 14, 2021 shall be excluded from computation under the Speedy Trial Act.  
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13 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

14                  **IT IS SO ORDERED.**

15                  DATED: 3/30/2021



16                  THE HONORABLE EDWARD J. DAVILA  
17                  UNITED STATES DISTRICT JUDGE